

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2011-262-C - ORDER NO. 2011-764
NOVEMBER 2, 2011

IN RE: Application of ANPI, LLC for a Certificate)	ORDER GRANTING
of Public Convenience and Necessity to)	APPLICATION
Provide Resold Intrastate Interexchange)	
Telecommunications Services and for)	
Alternative Regulation of Its Interexchange)	
Service Offerings)	

This matter comes before the Public Service Commission of South Carolina (“Commission”) by way of the Application of ANPI, LLC (“ANPI” or the “Company”) requesting a Certificate of Public Convenience and Necessity authorizing it to provide resold interexchange telecommunications services within the State of South Carolina. The Company’s Application was filed pursuant to S.C. Code Ann. § 58-9-280 (Supp. 2010) and the rules and regulations of the Commission. By its Application, ANPI also requests alternative regulation of its business interexchange services consistent with Commission orders and waiver of certain Commission regulations.

The Commission’s Clerk’s Office instructed ANPI to publish, one time, a Notice of Filing in newspapers of general circulation in the areas of the state affected by the Application. The purpose of the Notice of Filing was to inform interested parties of the Application of ANPI and of the manner and time in which to file the appropriate pleadings for participation in the proceeding. ANPI complied with this instruction and provided the Commission with proof of publication of the Notice of Filing. No Petitions

to Intervene or protests were filed. On September 12, 2011, the Company and the Office of Regulatory Staff submitted a Settlement Agreement, attached hereto as Order Exhibit No. 1.

Subsequently, a hearing was convened on September 26, 2011, at 2:30 p.m. in the offices of the Commission in Columbia, South Carolina, before Josh Minges, Hearing Examiner. ANPI was represented by John J. Pringle, Jr., Esquire. The Office of Regulatory Staff (“ORS”) was represented by Shannon Bowyer Hudson, Esquire.

Joseph O’Hara, chief financial officer of ANPI, testified in support of the Company’s Application. The record reveals that ANPI is a limited liability company organized under the laws of the State of Delaware and duly authorized to transact business in South Carolina. According to Mr. O’Hara, the Company seeks authority as a reseller of interexchange services. Mr. O’Hara explained the Company’s request for authority, and the record further reveals the Company’s services, operations, and marketing procedures. The Company intends to market its services by direct marketing and sales. Mr. O’Hara also discussed ANPI’s technical, financial, and managerial resources to provide the services for which it seeks authority.

With regard to technical, financial, and managerial capabilities, the Company’s Application and Mr. O’Hara’s testimony both evidence that ANPI management has extensive experience in telecommunications, information technology, regulatory matters, and accounting and finance. Mr. O’Hara also testified that ANPI will operate in accordance with Commission rules, regulations, guidelines, and Commission orders. Mr. O’Hara offered that approval of ANPI’s Application would serve the public interest.

Mr. O'Hara testified that the Company is financially qualified to operate and manage its proposed telecommunications in South Carolina.

Mr. O'Hara, on behalf of the Company, requests a waiver of 26 S.C. Code Ann. Regs. 103-610, since the Company's books are maintained in another state. Further, the Company requests an exemption from record keeping policies that require maintenance of financial records in conformance with the Uniform System of Accounts ("USOA"). ANPI maintains its books in accordance with Generally Accepted Accounting Principles ("GAAP").

After consideration of the applicable law, the Company's Application, and the evidence presented at the hearing, the Commission hereby issues its findings of fact and conclusions of law:

FINDINGS OF FACT

1. ANPI is incorporated under the laws of the State of Delaware and is authorized to do business in South Carolina by the Secretary of State.
2. ANPI desires to operate as a provider of resold interexchange services in South Carolina.
3. We find that ANPI possesses the managerial, technical, and financial experience and capability to operate as a provider, through resale, of interexchange services in South Carolina.
4. We find that the issuance of a Certificate of Public Convenience and Necessity to ANPI to operate as a reseller of interexchange services in South Carolina

would be in the best interest of the citizens of South Carolina by providing more innovative services.

5. ANPI requests a waiver of 26 S.C. Code Ann. Regs. 103-610. The Commission finds ANPI's requested waiver reasonable and understands the potential difficulty presented to ANPI should the waiver not be granted. Further, we find that a waiver of 26 S.C. Code Ann. Regs. 103-610 to be in the public interest. We also believe that exemption from the policies that would require the Company to keep its records under the USOA is reasonable.

6. The Company has the managerial, technical, and financial resources to provide the services as described in its Application.

CONCLUSIONS OF LAW

1. The Commission concludes that ANPI possesses the managerial, technical, and financial resources to provide the telecommunications services as described in its Application.

2. The Commission concludes that the issuance of the authority to provide intrastate interexchange telecommunications services as requested by ANPI and as set forth in its Application and Mr. O'Hara's testimony is in the best interests of the citizens of the State of South Carolina.

3. The Commission concludes that a Certificate of Public Convenience and Necessity should be granted to ANPI to provide resold intrastate interexchange telecommunications services.

4. The Commission adopts a rate design for ANPI for its residential interexchange services, if any, which includes maximum rate levels for each tariff charge. A rate structure incorporating maximum rate levels with the flexibility for adjustment below the maximum rate levels has been previously adopted by the Commission. *In Re: Application of GTE Sprint Communications Corporation, etc.*, Order No. 84-622, issued in Docket No. 84-10-C (August 2, 1984).

5. ANPI shall not adjust its residential interexchange rates for end-users, if any, below the approved maximum level without notice to the Commission and to the public. ANPI shall file its proposed rate changes, publish its notice of such changes, and file affidavits of publication with the Commission two weeks prior to the effective date of the changes. However, the public notice requirement is waived, and therefore not required, for reductions below the maximum cap in instances which do not affect the general body of subscribers or do not constitute a general rate reduction. *In Re: Application of GTE Sprint Communications, etc.*, Order No. 93-638, issued in Docket No. 84-10-C (July 16, 1993). Any proposed increase in the maximum rate level for residential interexchange services reflected in the tariff which would be applicable to the general body of the Company's subscribers shall constitute a general ratemaking proceeding and will be treated in accordance with the notice and hearing provisions of S.C. Code Ann. §58-9-540.

6. The Commission concludes that ANPI's intrastate interexchange business telecommunications services shall be regulated in accordance with the principles and procedures established for alternative regulation of business service offerings set out in

Order Nos. 95-1734 and 96-55 in Docket No. 95-661-C. The Commission has previously granted this “alternative regulation” to competitive intrastate interexchange carriers operating within South Carolina, and the Commission concludes that the competitive marketplace requires the Commission to allow this flexible regulation to those carriers which request it. Specifically, the Commission-approved alternative regulation allows business service offerings, including consumer card services and operator services, to be subject to a relaxed regulatory scheme identical to that granted to AT&T Communications in Order Nos. 95-1734 and 96-55 in Docket No. 95-661-C.

However, pursuant to Order No. 2001-997 (Docket No. 2000-407-C), this Commission has modified alternative regulation by the re-imposition of rate caps with regard to certain “operator-assisted calls” where a customer uses a local exchange carrier’s calling card to complete calls from locations which have not selected that local exchange carrier as the toll provider. Order No. 2001-997, dated November 8, 2001, imposed a maximum cap of \$1.75 for operator surcharges for such calls, and a maximum cap of \$0.35 related to the flat per-minute rate associated with these calls. Under this relaxed regulatory scheme, tariff filings for business services shall be presumed valid upon filing. The Commission will have seven (7) days in which to institute an investigation of any tariff filing. If the Commission institutes an investigation of a particular tariff filing within the seven (7) days, the tariff filing will then be suspended until further Order of the Commission.

7. We conclude that ANPI’s request for waiver of 26 S.C. Code Ann. Regs. 103-610 should be granted as strict compliance with the regulation would potentially

cause undue hardship on that Company. The waiver is not contrary to the public interest. We also grant exemption from the policies requiring the use of USOA.

IT IS THEREFORE ORDERED, ADJUDGED, AND DECREED THAT:

1. A Certificate of Public Convenience and Necessity should be granted to ANPI to provide intrastate interexchange services through the resale of services authorized for resale by tariffs of carriers approved by the Commission within the State of South Carolina.

2. The Company's rate designs for its products shall conform to those designs described in Conclusions of Law above.

3. If it has not already done so by the date of issuance of this Order, ANPI shall file its revised tariff utilizing the Commission's e-filing system for tariffs. The revised tariff should be electronically filed in a text searchable PDF format using the Commission's DMS System (<http://dms.psc.sc.gov>). An additional copy should be sent via email to etariff@psc.sc.gov to be included in the Commission's ETariff System (<http://etariff.psc.sc.gov>). Future revisions to the tariff should be made using the ETariff System. The revised tariff shall be consistent with the findings of this Order and shall be consistent with the Commission's Rules and Regulations.

4. The Company's service is subject to access charges pursuant to Commission Order No. 86-584, in which the Commission determined that for access purposes resellers and facilities-based interexchange carriers should be treated similarly.

5. With regard to the Company's resale of service, an end-user should be able to access another interexchange carrier or operator service provider if the end-user so desires.

6. ANPI shall resell the services of only those interexchange carriers or LECs authorized to do business in South Carolina by this Commission. If ANPI changes underlying carriers, it shall notify the Commission and the ORS in writing.

7. With regard to the origination and termination of toll calls within the same LATA, ANPI shall comply with the terms of Order No. 93-462, Order Approving Stipulation and Agreement, in Docket Nos. 92-182-C, 92-183-C, and 92-200-C (June 3, 1993), with the exception of the 10-XXX intraLATA dialing requirement, which has been rendered obsolete by the toll dialing parity rules established by the FCC pursuant to the Telecommunications Act of 1996 (See, 47 CFR 51.209). Specifically, ANPI shall comply with the imputation standard as adopted by Order No. 93-462 and more fully described in paragraph 4 of the Stipulation and Appendix B approved by Order No. 93-462.

8. ANPI shall file annual financial information in the form of annual reports and gross receipts reports as required by the Commission. The annual report and the gross receipt report will necessitate the filing of intrastate information. Therefore, ANPI shall keep financial records on an intrastate basis for South Carolina to comply with the annual report and gross receipts filings. The proper form for filing annual financial information can be found at the Commission's website at the ORS's website at www.regulatorystaff.sc.gov. The title of this form is "Telecommunications Company

Annual Report.” This form shall be utilized by the Company to file annual financial information with the Commission and ORS and shall be filed no later than **April 1st**.

Commission gross receipts forms are due to be filed with the Commission and ORS no later than **August 31st** of each year. The proper form for filing gross receipts information can be found at the ORS website at www.regulatorystaff.sc.gov, and the appropriate form is entitled “Gross Receipts Form.”

Each telecommunications company certified in South Carolina is required to file annually with the ORS the South Carolina Universal Service Fund ("USF") Contribution Worksheet, which may be found on the ORS's website at www.regulatorystaff.sc.gov. This worksheet provides ORS information required to determine each telecommunications company's liability to the State USF fund. The Intrastate USF worksheet is due to be filed annually no later than **July 1st** with the Commission and ORS.

9. The Company shall, in compliance with Commission regulations, designate and maintain an authorized utility representative who is prepared to discuss, on a regulatory level, customer relations (complaint) matters, engineering operations, tests, and repairs. In addition, the Company shall provide to the Commission and ORS in writing the name of the authorized representative to be contacted in connection with general management duties as well as emergencies which occur during non-office hours. ANPI shall file the names, addresses, and telephone numbers of these representatives with the Commission within thirty (30) days of receipt of this Order. The “Authorized Utility Representative Information” form can be found at the ORS website at

www.regulatorystaff.sc.gov; this form shall be utilized for the provision of this information to the Commission and ORS. Further, the Company shall promptly notify the Commission and ORS in writing if the representatives are replaced.

10. The Company is directed to comply with all Rules and Regulations of the Commission, unless a regulation is specifically waived by the Commission.

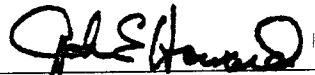
11. At the hearing, Mr. O'Hara requested a waiver of 26 Code Ann. Regs. 103-610 (Supp. 2010). The Commission finds ANPI's requested waiver reasonable and understands the potential difficulty presented to ANPI should the waiver not be granted. The Commission therefore grants the requested waiver. However, ANPI shall make available its books and records at all reasonable times upon request by the Office of Regulatory Staff, and ANPI shall promptly notify the Commission and ORS if the location of its books and records changes.

12. ANPI also requests that it be exempt from record keeping policies that require a carrier to maintain its financial records in conformance with the Uniform System of Accounts. The USOA was developed by the FCC as a means of regulating telecommunications companies subject to rate base regulation. As a competitive carrier, ANPI maintains its book of accounts in accordance with Generally Accepted Accounting Principles. GAAP is used extensively by interexchange carriers and other competitive telecommunications carriers. Accordingly, ANPI requests an exemption from the USOA requirements. We grant the Company's request for the reasons stated above.

13. The Settlement Agreement between the parties is hereby approved.

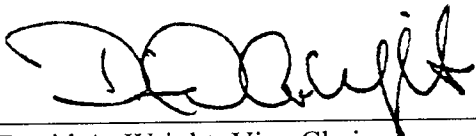
14. This Order shall remain in full force and effect until further Order of the Commission.

BY ORDER OF THE COMMISSION:



John E. Howard, Chairman

ATTEST:



David A. Wright, Vice Chairman
(SEAL)

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2011-262-C

In Re:)	
Application of ANPI, LLC)	
for a Certificate of Public)	
Convenience and Necessity to Provide)	SETTLEMENT AGREEMENT
Resold Intrastate Interexchange)	
Telecommunications Services and for)	
Alternative Regulation of Its)	
Interexchange Service Offerings)	

This Settlement Agreement ("Settlement Agreement") is made by and among the Office of Regulatory Staff ("ORS") and ANPI, LLC ("ANPI" or "the Company") (collectively referred to as the "Parties" or sometimes individually as "Party");

WHEREAS, on June 23, 2011, ANPI filed its Application requesting: (i) a Certificate of Public Convenience and Necessity be granted authorizing the Company to provide resold intrastate interexchange telecommunication services; (ii) that its interexchange service offerings be regulated in accordance with procedures established for alternative regulation, pursuant to South Carolina Code § 58-9-585, as was first granted by the Commission in Order Nos. 95-1734 and 96-55 in Docket No. 95-661-C; (iii) waiver of Public Service Commission of South Carolina ("Commission") Regulation 103-610 regarding location of records; and (iv) a waiver of any requirement to maintain financial records in conformance with the Uniform System of Accounts ("USOA");

WHEREAS, on June 30, 2011, counsel for ORS entered a Notice of Appearance in this matter;

WHEREAS, on July 5, 2011, the Commission issued its Order No. 2011-479 by which the Commission appointed Josh M. Minges, Esquire as the Hearing Examiner in this matter;

WHEREAS on June 30, 2011, the Commission issued a Notice of Filing and Hearing and established a return date of August 1, 2011, for the filing of letters of protest or petitions to intervene and established a hearing date of September 26, 2011 for the Application to be heard before a hearing examiner;

WHEREAS, on August 10, 2011, the Company filed the direct testimony of Joseph O'Hara with the Commission;

WHEREAS, the purpose of this proceeding is to review the application filed by the Company and its requests described above

WHEREAS, since the filing of the notice, ORS has conducted a review of the technical, managerial, and financial expertise of the Company to provide the services requested in the Application;

WHEREAS, the Company requested protective treatment of the Financial Statements, Exhibit 4 of the Application, and thereafter protective treatment was granted on July 6, 2011;

WHEREAS, ORS has reviewed the Application and the financial data provided by the Company, and ORS has calculated certain performance ratios based upon information provided by the Company;

WHEREAS, ORS has investigated the services to be offered by the Company and its intended customer service plans;

WHEREAS, ORS has reviewed the proposed tariffs submitted by the Company;

WHEREAS, ORS has reviewed the pre-filed testimony of Joseph O'Hara;

WHEREAS, as a result of its investigations, ORS has determined: (a) the Company intends to offer resold intrastate interexchange telecommunication services; (b) the Company's officers appear to possess sufficient technical and managerial abilities to adequately provide the services applied for; (c) the Company's proposed tariffs with the amendments as agreed to in this Settlement Agreement comply with Commission statutes and regulations; (d) the services provided by the Company will meet the service standards required by the Commission; (e) the provision of services by the Company will not adversely impact the availability of affordable telecommunications services; (f) to the extent it is required to do so by the Commission, the Company will participate in the support of universally available telephone service at affordable rates; and (g) the provision of interexchange services by the Company will not adversely impact the public interest;

WHEREAS, to ensure compliance with the Commission's statutes and regulations, the Parties have agreed to the following comprehensive settlement of all issues in this docket;

WHEREFORE, in the spirit of compromise, the Parties hereby stipulate and agree to the following terms and conditions:

- 1) The Parties agree that ANPI's Application and exhibits to the Application are incorporated into this Settlement Agreement and made a part hereof;
- 2) The Parties agree to stipulate into the record before the Commission this Settlement Agreement. The Parties also agree to stipulate to the pre-filed testimony of the Company's witness O'Hara without cross-examination by ORS;
- 3) The Parties agree that the Company should be granted a Certificate of Public Convenience and Necessity to provide resold intrastate interexchange telecommunications services within the state of South Carolina;

4) The Company has requested a waiver of 26 S.C. Code Ann. Regs. 103-610 concerning the location of books and records. However, S.C. Code Ann. §58-9-380 (Supp. 2010) provides that:

Each telephone utility shall have an office in one of the counties of this State in which its property or some part thereof is located and shall keep in such office all such books, accounts, papers and records as shall reasonably be required by the Office of Regulatory Staff. No books, accounts, papers or records required by the ORS to be kept within the State shall be removed at any time from the State except upon such conditions as may be prescribed by the Office of Regulatory Staff.

ORS is agreeable to allowing the Company to maintain its books and records outside of the State of South Carolina in exchange for the Company agreeing to provide access to its books and records. ORS is agreeable to the Company maintaining its books and records at its principal offices in the State of Illinois, and the Company agrees to notify the ORS of any change in the location of the principal office or in the location where the books and records are maintained. This provision of the Settlement Agreement shall not be construed as a waiver by ORS of S.C. Code Ann. § 58-4-55 (Supp. 2010) or § 58-9-1070 (Supp. 2010). ORS expressly reserves its rights to require the production of books, records and other information located within or outside of the State of South Carolina in order to carry out its duties and compliance with any state or federal regulation;

5) ORS does not oppose ANPI's request for alternative regulation of its interexchange service offerings consistent with South Carolina Code § 58-9-585 and the procedures described and set forth in Orders 95-1734 and 96-55 in Docket No. 96-661-C as modified by Order No. 2001-997 in Docket No. 2000-407-C, specifically (i) regulation of these services listed above in the same manner as these services are regulated of other similar carriers, (ii) removal of the maximum rate tariff requirements for ANPI's business services, private line, and customer

network-type offerings, except in instances governed by Order No. 2001-997 which reinstituted maximum rates for surcharges and rates associated with certain intrastate operator-assisted calls; (iii) presumptively valid tariff filings for these interexchange services unless an investigation of a particular filing is instituted within seven (7) days, in which case the tariff filing will be suspended until resolution of the investigation or until further order of the Commission; and (iv) grant ANPI the same treatment as other similar carriers in connection with any future relaxation of reporting requirements;

6) The Company has requested a waiver of any rule or regulation that might require a carrier to maintain its financial records in conformance with the Uniform System of Accounts ("USOA"). The Company acknowledges that S.C. Code Ann. § 58-9-340 (Supp. 2010) provides that the ORS may, in its discretion and subject to the approval of the Commission, prescribe systems of accounts to be kept by telephone utilities subject to the commission's jurisdiction and that the ORS may prescribe the manner in which the accounts shall be kept and may require every telephone utility to keep its books, papers, and records accurately and faithfully according to the system of accounts as prescribed by the ORS. The Company agrees to keep its books, papers, and records in such a manner that permits ORS to audit its revenues and expenses associated with its South Carolina operations for compliance with programs such as but not limited to the Universal Service Fund ("USF"), the Interim LEC Fund, , and gross receipts. The Company agrees to complete the reporting forms for such programs as but not limited to USF, Interim LEC, and gross receipts as may be required by the ORS of telecommunications companies certificated to operate within South Carolina and as the reporting forms may be amended from time to time;

7) The Company agrees to resell the services only of those interexchange providers authorized to do business in South Carolina by the Commission. The Company agrees to notify ORS and the Commission, in writing, if ANPI changes its underlying carriers;

8) The Company agrees to file necessary financial information with the Commission and ORS for universal service fund reporting, interim LEC fund reporting, annual reporting, gross receipts reporting, and/or any other reporting which may now or in the future be applicable to telecommunications providers such as ANPI. The Parties agree that such reports shall be filed pursuant to ORS's instructions and monies shall be remitted in accordance with the directions of the ORS and the Commission requirements.

9) The Company agrees to maintain its books and records associated with its South Carolina operations in a manner that would permit ORS to examine any of ANPI's reports filed with the Commission and provided to ORS.

10) The Company agrees to file with the Commission and ORS a completed authorized utility representative form within thirty (30) days of the Commission's order.

11) In the event that the Company offers prepaid calling card services in the future, ANPI agrees that it shall obtain Commission approval and post a surety bond in the amount of \$5,000 as required by the Commission;

12) In the event that the Company expands its authority and offers prepaid local exchange service, ANPI agrees to comply with South Carolina Regulation 103-607 in that it will obtain a bond, irrevocable letter of credit, or certificate of deposit per the Commission's request, or obtain an appropriate waiver of same.

13) The Company agrees to comply with South Carolina Code Ann. § 58-9-300 entitled "Abandonment of Service." Additionally, to the extent applicable, ANPI agrees to adhere to the

FCC's rule 47 C.F.R. §§ 64.1190 and 64.1130 regarding preferred carrier freezes and the requirement that the form of the written authorization for the institution of the freeze be a separate or easily separable document. Prior to abandonment of service, the Company shall remove any preferred carrier freeze so as to enable consumers to seamlessly transfer their telephone numbers to another provider;

14) The Company agrees to comply with all rules and regulations of the Commission unless the Commission has expressly waived such rule or regulation;

15) The Company agrees to file a final revised tariff with both the ORS and the Commission within thirty days of the Commission Order granting certification, and the revised tariff shall reflect and be in accordance with ORS's recommendations. Further, the Company agrees to file and maintain its tariff with the Commission electronic tariff filing system.

16) ORS is charged by law with the duty to represent the public interest of South Carolina pursuant to S.C. Code § 58-4-10 (B). S.C. Code § 58-4-10(B)(1) through (3) read in part as follows:

... 'public interest' means a balancing of the following:

- (1) concerns of the using and consuming public with respect to public utility services, regardless of the class of customer;
- (2) economic development and job attraction and retention in South Carolina; and
- (3) preservation of the financial integrity of the State's public utilities and continued investment in and maintenance of utility facilities so as to provide reliable and high quality utility services.

ORS believes the Settlement Agreement reached among the Parties serves the public interest as defined above;

17) The Parties agree to advocate that the Commission accept and approve this Settlement Agreement in its entirety as a fair, reasonable and full resolution of all issues in the

above-captioned proceeding and that the Commission take no action inconsistent with its adoption. The Parties further agree to cooperate in good faith with one another in recommending to the Commission that this Settlement Agreement be accepted and approved by the Commission. The Parties agree to use reasonable efforts to defend and support any Commission order issued approving this Settlement Agreement and the terms and conditions contained herein.

18) The Parties represent that the terms of this Settlement Agreement are based upon full and accurate information known as of the date this Settlement Agreement is executed. If, after execution, either Party is made aware of information that conflicts, nullifies, or is otherwise materially different than that information upon which this Settlement Agreement is based, either Party may withdraw from the Settlement Agreement with written notice to the other Party;

19) The Parties agree that signing this Settlement Agreement will not constrain, inhibit, impair or prejudice their arguments or positions held in other collateral proceedings, nor will it constitute a precedent or evidence of acceptable practice in future proceedings. If the Commission declines to approve the Settlement Agreement in its entirety, then any Party desiring to do so may withdraw from the Settlement Agreement in its entirety without penalty or obligation.

20) This Settlement Agreement shall be interpreted according to South Carolina law.

21) The above terms and conditions fully represent the agreement of the Parties hereto. Therefore, each Party acknowledges its consent and agreement to this Settlement Agreement by affixing its signature or by authorizing counsel to affix his or her signature to this document where indicated below. Counsel's signature represents his or her representation that his or her client has authorized the execution of the agreement. Facsimile signatures and email signatures shall be as effective as original signatures to bind any party. This document may be signed in

counterparts, with the original signature pages combined with the body of the document constituting an original and provable copy of this Settlement Agreement. The Parties agree that in the event any Party should fail to indicate its consent to this Settlement Agreement and the terms contained herein, then this Settlement Agreement shall be null and void and will not be binding on any Party.

WE AGREE:

Representing the Office of Regulatory Staff

Shannon B. Hudson

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Sept. 6, 2011

Date

WE AGREE:

Representing ANPI, LLC



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9/7/11
Date